

1/25/00  
Date: 1/25/00 11:25 AM  
Sender: "Joe Kimble" <kimblej@cooley.edu>  
To: Tony Fazio  
Priority: Normal  
Subject: Re: Proposed Rulemaking Procedures-FAA 1999-6622 - 15

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Mr. Fazio,

Thank you. I did not include them in the public docket.

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>>> "Tony Fazio" <Tony.Fazio@faa.gov> 01/25/00 08:34AM >>>  
Mr. Kimble,

Thank you for your comments. I will make sure your comments are included in the public docket if you haven't already done so.

Reply Separator  
Subject: Proposed Rulemaking Procedures--FAA 1999-6622  
Author: "Joe Kimble" <kimblej@cooley.edu>  
Date: 1/24/00 4:56 PM

Dear Mr. Fazio,

I would like to strongly endorse the proposed new FAA general rulemaking procedures.

Although I'm not an expert in FAA matters, I do have a background in legal writing and legal drafting. I've taught legal writing for 15 years, and I've published extensively on the subject of plain language in legal writing. Among other professional activities, I'm an editor of The Scribes Journal of Legal Writing, and I edit a writing column in the Michigan Bar Journal.

The proposed new FAA rules are among the clearest federal regulations that I have read. I might like to see fewer initialisms (ANPRM, ARAC), but in other respects the rules are well done. The question-and-answer format is very reader-friendly, and so are the personal pronouns. The sentences and paragraphs are short, and the rules are mercifully free of jargon. They use examples, tables, and lists to good advantage. And the undesignated

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center headings are a nice organizing (and navigating) device. Of course, these techniques are ones that plain-language experts have long recommended.

I expect that the new rules will save readers a good deal of time and energy, and spare them unnecessary frustration. Last year I reviewed all the research on plain language and came to these conclusions: "Readers strongly prefer plain language in public and legal documents, they understand it better than legalistic style, they find it faster and easier to use, they are more likely to comply with it, and they are much more likely to read it in the first place." I think your rules will bear out these conclusions, and I commend the FAA on making this effort.

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